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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RENE GARCIA, an Individual,

Plaintiff,

vs.

AIDS HEALTHCARE FOUNDATION, a
Foreign Non-Profit Corporation, DOES I -
X; and ROE CORPORATIONS I -X.

Defendant.

CASE NO.: 2:19-cv-00404-JCM-NJK

**MOTION REQUESTING EXTENSION
OF TIME TO FILE AN ANSWER ON
BEHALF OF DEFENDANT**

Plaintiff Rene Garcia by and through his attorneys, Jenny L. Foley, Ph.D., Esq. and Marta Kurshumova, Esq. of HKM Employment Attorneys LLP, hereby submits this Motion Requesting Extension of Time to File an Answer on behalf of Defendant, AIDS Healthcare Foundation and their counsel, Arti Bhimani, Defendant's Assistant General Counsel. The parties have agreed as follows:

1. On or about March 25, 2019, Arti Bhimani, Assistant General Counsel for Defendant, contacted Plaintiff's attorneys requesting a two-week extension to respond to the Complaint. See Exhibit 1.

2. Plaintiff's counsel agreed to the extension. See Exhibit 1.
3. Defendant does not yet have local counsel and, therefore, the parties cannot file a stipulation.
4. In lieu of a stipulation for extension of time, Plaintiff hereby respectfully requests the Court to allow Defendant a two-week extension to file an answer.
5. Plaintiff and Defendant have agreed that the new due date for filing the answer is April 15, 2019.

Dated this 1st Day of April, 2019.

HKM EMPLOYMENT ATTORNEYS, LLP

/s/ Jenny L. Foley

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IT IS SO ORDERED that the due date for Defendant's answer is moved from April 1, 2019 to April 15, 2019.


UNITED STATES MAGISTRATE JUDGE